

THE LAW OFFICE OF
LENNY RAPADAS

Leonardo M. Rapadas
lrapadas@tttguamlawyers.com

Suite 2A, 130 Aspinall Avenue
Hagåtña, Guam 96910

Telephone: (671) 477-9893/4
Facsimile: (671) 472-2601

To: The Honorable Judge Pamela K. Chen, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Via: Electronic Filing

Date: January 19, 2018

Re: Richard K. Lai - 17-CR-224 (Amended January 17, 2018 letter)

Dear Judge Chen:

I am making a request of the Court. It is not dissimilar to the travel modification request made by Mr. Lai in August of 2017 to the CNMI. As you know, Mr. Lai is a businessman and among his companies is a chain of restaurants on Guam and Saipan, CNMI.

His companies and restaurants have had and continues to have a long business relationship with a company called Richmond Wholesale in San Francisco, CA. Their relationship spans over 30 years. Richmond Wholesale provides the U.S. meat and seafood to the family company in Guam called Quality Distributors, which in turn, provides to their restaurants, other restaurants and local hotels.

With the economic downturn in Guam because of a major loss in our major tourist base and revenue, Japan, a new business opportunity has arisen where Quality Distributors is being asked to provide its products to the old Clark Air Base in the Philippines. Clark has become the economic zone for the area. Many hotels, restaurants and golf courses have been built there. There is still a significant amount of growth there at this time. Those businesses are in need of good U.S. beef. Quality Distributors would be working with Richmond Wholesale to accomplish that. Richmond Wholesale would like to do that with Quality taking the lead.

There would be an initial set up time, then maybe two times a month for the first six months. And probably once a month once things work out. Each trip may take anywhere from three to seven days. The day to day work will be done with local trained Philippine employees.

At present, pursuant to this Court's Order Setting Conditions of Release and Appearance Bond, Attachment A, paragraphs 3 and 4, Mr. Lai may, without permission, retrieve his passport from the U.S. Pretrial Services Office in Guam to travel to Hawaii, California, Oregon, Washington State, EDNY, SDNY, the District of New Jersey, and to the Commonwealth of the Northern Mariana Islands pursuant to your order so long as he provided his travel itinerary to Pretrial Services. I have attached the Court's Order and Attachment A for its convenience.

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However, prior to travel to the Philippines, Mr. Lai will request permission from Pretrial Services to travel there and to retrieve his passport for the purpose stated above. Upon his return, Mr. Lai will return it to Pretrial Services.

I am requesting on behalf of Mr. Lai that his Order be amended to include the Philippine Islands on that list so that he be able to set to and run his new business venture there. Mr. Lai is not a flight risk. He has deep personal and professional roots in Guam with no incentive to violate his conditions. He signed an appearance bond of \$1,000,000.00 which is secured by property in Seattle, Washington for which he executed a confession of judgment. The USAO EDNY has consented to the requested modification for travel. I humbly await your decision.

Respectfully submitted,



LEONARDO M. RAPADAS
Counsel for Richard K. Lai

Attachments